

SWIDLER BERLIN SHEREFF FRIEDMAN, LLP

THE WASHINGTON HARBOUR  
3000 K STREET, NW, SUITE 300  
WASHINGTON, DC 20007-5116  
TELEPHONE (202) 424-7500  
FACSIMILE (202) 424-7647  
WWW.SWIDLAW.COM

NEW YORK OFFICE  
THE CHRYSLER BUILDING  
405 LEXINGTON AVENUE  
NEW YORK, NY 10174  
TEL. (212) 973-0111  
FAX (212) 891-9598

March 26, 2004

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Ms. Marlene H. Dortch, Secretary  
Federal Communications Commission  
c/o Natek, Inc.  
236 Massachusetts Avenue, NE  
Suite 110  
Washington, DC 20002  
Attn: Dennis Johnson, Wireline Competition Bureau

Re: Focal Communications Corporation/Corvis Corporation  
**WC Docket No. 04-126**

Dear Mr. Johnson:

Focal Communications Corporation ("Focal") and Corvis Corporation ("Corvis") hereby supplement the above-captioned application and respond to your inquiry regarding the extent of overlap between the regulated services provided by subsidiaries of Focal and Corvis.

Focal, through its operating subsidiaries provides regulated services in the States of California, Connecticut, Delaware, Florida, Georgia, Illinois, Indiana, Maryland, Massachusetts, Michigan, Minnesota, New Jersey, New York, Ohio, Pennsylvania, Texas, Virginia, and Washington, as well as in Washington, D.C. Although Focal subsidiaries provide a complete line of telecommunications' products and services, Focal is primarily a competitive local exchange carrier with 4,000 enterprise and wholesale/carrier customers. Focal operates in 23 Tier 1 metropolitan markets, including Boston, Miami, New York and Los Angeles and has facilities-based local networks in nine cities. While Focal subsidiaries do provide long distance services to customers throughout the states described above, such services are provided predominantly in connection with its competitive local exchange operations. Virtually all of Focal's long distance services are offered through the resale of other long distance carriers' services. Focal does not provide long distance services in states other than those identified above.

Corvis, through its subsidiary Broadwing, also provides a suite of communications products and services. Broadwing owns and operates an extensive ultra-long haul, all-optical network and IP backbone that provides networking solutions for voice, video and data

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applications used by carriers and enterprises. Broadwing does not provide local services but does offer long distance service on a nationwide basis.

Focal and Corvis submit that the operations of the two companies are largely complimentary in nature. Because Broadwing does not provide local services, there is no overlap between Focal's core operations – its local exchange operations - and the operations of Corvis' regulated subsidiaries. In some instances, it is possible that Focal and Broadwing do offer competing long distance products in some metropolitan areas. Neither company controls a dominant market share in any such markets however, and the companies each face a host of competitors in all such markets. Given that the overlap between Focal and Corvis is relatively circumscribed in nature, the Applicants respectfully submit that the proposed transaction will have no adverse impact on the level of competition in their respective markets.

An original and four (4) copies of this letter are enclosed. Please date stamp and return the enclosed extra copy of this letter. Please feel free to address any further inquiries regarding the above-captioned matter to the undersigned at (202) 945-6997.

Respectfully submitted,



Robert E. Stup, Jr.  
Michelle S. Cadin  
Mintz, Levin, Cohn, Ferris  
Glovsky and Popeo, P.C.  
701 Pennsylvania Avenue, NW  
Washington, D.C. 20004  
(202) 585-3536 – Telephone  
(202) 434-7400 – Fax  
[restup@mintz.com](mailto:restup@mintz.com)  
[mscadin@mintz.com](mailto:mscadin@mintz.com)

Counsel for Corvis Corporation

Catherine Wang  
Edward S. Quill, Jr., Esq.  
Swidler Berlin Shereff Friedman, LLP  
3000 K Street, NW, Suite 300  
Washington, D.C. 20007  
(202) 424-7500 – Telephone  
(202) 424-7643 – Fax  
[cwang@swidlaw.com](mailto:cwang@swidlaw.com)  
[esquill@swidlaw.com](mailto:esquill@swidlaw.com)

Counsel for Focal Communications  
Corporation